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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91197005
Party	Plaintiff Gold Rush Brands, LLC
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Submission	Opposition/Response to Motion
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Date	01/11/2011
Attachments	PAN AM Response.pdf (2 pages)(133193 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Application Serial No. 77/931,658
For the Mark PAN AM & Design

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Gold Rush Brands, LLC,	:	
	:	
Opposer,	:	
	:	
v.	:	Opposition No.: 91/197,005
	:	
Pan Am World Airways, Inc.,	:	
	:	
Applicant	:	
	X	

OPPOSER’S RESPONSE TO APPLICANT’S MOTION TO STAY

Gold Rush Brands, LLC (“Opposer”), hereby responds to the Motion to Stay filed by Applicant, Pan Am World Airways, Inc. (“Applicant”), on December 22, 2010. To the extent that Applicant seeks only the limited relief of staying the proceedings until such time as the Board rules on Applicant’s Motion To Amend, which has been fully briefed and remains pending, then Opposer does not object. Opposer recognizes that such motions to stay are typically applicable only in response to summary judgment motions, yet Opposer believes that under the circumstances a stay pending the Board’s ruling will serve the interests of judicial economy.

Dated: January 11, 2011

Respectfully submitted,
Gold Rush Brands, LLC

By: _____/s/
Edmund J. Ferdinand, III, Esq.
Jeffers Cowherd P.C.
55 Walls Drive
Fairfield, CT 06824

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this Response was served on the Applicant on this 11th day of January, 2011 by sending a copy of the document in an envelope via U.S. mail addressed to the Applicant:

Daniel Garrelick, Esq.
Springfield Terminal Railway Co.
1700 Iron Horse Park
Billerica, MA 01862

_____/s/_____
Edmund J. Ferdinand, III